



Wannalancit Mills  
650 Suffolk Street  
Lowell, MA 01854

978.970.5600 PHONE  
978.453.1995 FAX

[www.TRCSolutions.com](http://www.TRCSolutions.com)

December 30, 2014

Kimberly N. Tisa, PCB Coordinator  
United States Environmental Protection Agency  
5 Post Office Square, Suite 100  
Mail Code: OSRR07-2  
Boston, Massachusetts 02109-3912

**Re: TSCA Risk-Based Work Plan Modification- Former Kiley Barrel Site  
Somerville, Massachusetts**

Dear Ms. Tisa:

On behalf of the Somerville Redevelopment Authority (SRA) and the City of Somerville, TRC Environmental Corporation (TRC) is requesting the following modification to the September 17, 2014 TSCA Risk-Based Work Plan (Work Plan) prepared pursuant to 40 CFR 761.61(c) to address polychlorinated biphenyls in soil at the Former Kiley Barrel Site, located in Somerville, Massachusetts (Site). This modification follows Condition 20 of the October 3, 2014 PCB Risk-Based Disposal Approval under 40 CFR § 761.61(c), which request written approval of changes to the Work Plan.

As discussed with you this morning, Section 6.2.11 of the Work Plan states that "Filling operations shall continue until the fill has been brought up to within one foot below the finished grade in areas where crushed stone will be applied..." Due to construction recommendations, where crushed stone will be applied clean backfilling operations will continue up to within six inches of the finished grade with common borrow. A three foot thick cap of soil and stone will be maintained with this modification we are just requesting a shift in the type material thicknesses within the cap. This modification will still provide the protective surface required yet also create a more stable surface for the Site.

If there are any questions, please contact the undersigned at (978) 656-3518 or via email at [sbuchanan@trcsolutions.com](mailto:sbuchanan@trcsolutions.com).

Sincerely,  
**TRC Environmental Corporation**

A handwritten signature in blue ink, appearing to read "N. Scott Buchanan", is written over a faint, larger version of the signature.

N. Scott Buchanan  
Project Manager

Cc Alan Petersen, EPA(via email)  
Amanda Maher, City of Somerville (via email)